

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
U S WEST's Comparably Efficient)
Interconnection Plan for Payphone)
Services)
)
Implementation of the Pay Telephone)
Reclassification and Compensation)
Provisions of the Telecommunications Act)
of 1996)

CC Docket No. 96-128

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JUN - 2 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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REPLY TO OPPOSITION

U S WEST, Inc. ("U S WEST"), pursuant to Section 1.45(a) of the Federal Communications Commission's ("Commission") rules,¹ hereby replies to the American Public Communications Council's ("APCC") Opposition² to U S WEST's Amendment to its Comparably Efficient Interconnection ("CEI") Plan for Payphone Services.³

U S WEST's Amendment to its CEI Plan did one thing -- it deleted references to CUSTOMNET in U S WEST's CEI Plan. This change was necessary to be consistent with U S WEST's corrected federal tariff. APCC asserts that U S WEST's actions in removing CUSTOMNET service from its federal tariff were

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¹ 47 C.F.R. § 1.45(a).

² Opposition of the American Public Communications Council to U S WEST's Amendment to its CEI Plan, filed May 21, 1997 ("Opposition").

³ Amendment of Plan of U S WEST, Inc. to Offer Comparably Efficient Interconnection for Payphone Services, filed Apr. 25, 1997 ("Amendment").

the equivalent of “sleight of hand.”⁴ This is nonsense. APCC is simply using its Opposition as an opportunity to repeat ad nauseum the same arguments that it has raised with respect to CUSTOMNET in its earlier Petition for Reconsideration⁵ and Application for Review⁶ and in other comments during the course of the payphone proceeding.⁷ U S WEST will not burden the Commission by repeating its earlier refutation of APCC’s unsupported CUSTOMNET allegations. U S WEST’s response is contained in Attachment A, which demonstrates that CUSTOMNET is not a “payphone specific” service and that Commission assent was required for U S WEST to withdraw CUSTOMNET on one-day’s notice.⁸ U S WEST’s actions in withdrawing CUSTOMNET were in full compliance with all applicable Commission rules.

U S WEST’s Amendment to its CEI Plan is a minor amendment.⁹ APCC has presented no evidence or arguments which raise any substantive issues on U S WEST’s compliance with the Commission’s CI-III requirements. As such, the

⁴ See Opposition at 5.

⁵ See Petition of the American Public Communications Council for Clarification or in the Alternative Reconsideration, filed May 5, 1997.

⁶ See Consolidated Application of the American Public Communications Council for Review of the CEI Orders, filed May 19, 1997.

⁷ See, e.g., Motion of the American Public Communications Council for a Ruling on the Bell Companies’ Compliance with the Payphone Order, filed Mar. 26, 1997.

⁸ See Opposition of U S WEST Communications, Inc., filed May 20, 1997.

⁹ See In the Matter of Bell Operating Companies’ Joint Petition for Waiver of Computer II Rules, Memorandum Opinion and Order, 10 FCC Rcd. 1724 (1995).

Commission should deny APCC's Opposition and allow U S WEST's Amendment to take effect as filed.

Respectfully submitted,

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ATTACHMENT A

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Implementation of the Pay Telephone)	CC Docket No. 96-128
Reclassification and Compensation)	
Provisions of the Telecommunications Act)	
of 1996)	

OPPOSITION OF U S WEST COMMUNICATIONS, INC.

U S WEST Communications, Inc. ("U S WEST"), pursuant to Section 1.106(g)¹ of the Federal Communications Commission's ("Commission") rules, hereby files its opposition to American Public Communications Council's (or "APCC") Petition for Clarification or in the Alternative Reconsideration.² APCC's Petition seeks clarification or reconsideration of the Commission's April 4, 1997 Order which clarified and provided local exchange carriers ("LEC") with a limited waiver of the Commission's federal tariff requirements for unbundled payphone features and functions.³

¹ 47 C.F.R. § 1.106(g).

² Petition of the American Public Communications Council for Clarification or in the Alternative Reconsideration, filed herein May 5, 1997 ("Petition").

³ In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-678, rel. Apr. 4, 1997 ("Waiver Order"). See also In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Report and Order, 4 Comm. Reg. (P&F) 938, FCC 96-388, rel. Sep. 20, 1996 ("Payphone Order"); Order on Reconsideration, 5 Comm. Reg. (P&F) 321, FCC 96-439, rel. Nov.

In its Petition, APCC asserts that U S WEST and other Regional Bell Operating Companies ("RBOC") are refusing to comply with the requirements of the Order on Reconsideration and the Waiver Order by failing to file federal tariffs for unbundled payphone specific features and functions.⁴ APCC holds up U S WEST's withdrawal of its CUSTOMNET tariff as an example of noncompliant behavior. APCC asserts that CUSTOMNET is a "payphone-specific" service and that U S WEST has violated the requirements of the Waiver Order by withdrawing CUSTOMNET.⁵ Neither assertion is true. As U S WEST demonstrates below, CUSTOMNET is not a "payphone-specific" service. Furthermore, U S WEST withdrew its interstate CUSTOMNET tariff filing with full knowledge and assent of the Competitive Pricing Division.⁶

I. APCC'S PROPOSED CLARIFICATION OF THE TERM "PAYPHONE-SPECIFIC" FEATURES AND FUNCTIONS IS OVERLY BROAD

In its Waiver Order, the Commission clarified that "the requirement to file federal tariffs applies only to payphone-specific, network-based, unbundled features and functions provided to others or taken by a LEC's operations[.]"⁷ The Commission "[did] not include in this federal tariffing requirement features and

8, 1996 ("Order on Reconsideration"), appeal pending sub nom. Illinois Public Telecommunications Assn. v. FCC, No. 96-1394 (D.C. Cir., filed Oct. 17, 1996).

⁴ APCC's claim is premature in that the Commission's Waiver Order allowed LECs 45 days (i.e., until May 19, 1997) to file federal tariffs for payphone specific functions and features. Waiver Order ¶ 1.

⁵ Petition at 4-6.

⁶ CUSTOMNET continues to be available in all of U S WEST's intrastate tariffs on an unrestricted basis. See U S WEST's Application No. 245, filed Apr. 11, 1997.

⁷ Waiver Order ¶ 18.

functions that are generally available to all local exchange customers and are only incidental to payphone service, such as touchtone services and various custom calling features.”⁸ The Commission’s clarification represented a significant narrowing of the federal tariffing requirement.⁹

In seeking clarification or reconsideration of the federal tariffing requirement, APCC asks the Commission to clarify that the term “payphone-specific” features includes “any unbundled feature that payphone service providers (“PSPs”) may require or find useful in configuring [their payphone] service and are not limited to features offered exclusively or predominately to PSPs.”¹⁰ U S WEST opposes APCC’s request as unreasonably broad and contrary to the public interest. It is impossible to classify APCC’s request as a clarification of the Waiver Order. It is a request for reconsideration and wholesale abandonment of the Commission’s clarification in its Waiver Order. APCC’s proposed definition would require LECs to file federal tariffs for virtually every intrastate network-based service that PSPs use or may use in the future. This is neither reasonable nor necessary to achieve the competitive goals of Section 276 of the Act¹¹ and the Commission’s Payphone

⁸ Id.

⁹ The Commission’s Order on Reconsideration appeared to require LECs to file federal tariffs for any unbundled feature or function used by a LEC to provide payphone service. (See Order on Reconsideration, 5 Comm. Reg. at 365 ¶¶ 162-163). Thus, a literal reading of the Order on Reconsideration would require LECs to file federal tariffs for all intrastate services, other than PAL lines, that a LEC uses in its payphone operations. U S WEST originally filed its federal CUSTOMNET tariff in an attempt to comply with this requirement.

¹⁰ Petition at 3 (footnote omitted).

¹¹ 47 U.S.C. § 276.

Order.

II. CUSTOMNET IS NOT A "PAYPHONE-SPECIFIC SERVICE"

U S WEST filed a federal tariff for CUSTOMNET service not because it believed that CUSTOMNET was a "payphone-specific" service – but because it was used by U S WEST's payphone operation.¹² With the Commission's clarification of LEC federal tariffing requirements in its Waiver Order, U S WEST filed a request for special permission to withdraw CUSTOMNET.¹³ In this Application, U S WEST fully explained why it was withdrawing CUSTOMNET from its Access Services tariff. The Commission granted U S WEST's Application¹⁴ and U S WEST withdrew its CUSTOMNET tariff filing on April 14, 1997.¹⁵ U S WEST took this action with full knowledge of the Commission. U S WEST believed then and believes now that it is in full compliance with the Commission's Waiver Order.

U S WEST does not deny that CUSTOMNET is a call screening service. However, this service is "generally available to all local exchange customers" and customers other than PSPs account for approximately 70 percent of the lines that subscribe to CUSTOMNET. CUSTOMNET is primarily a business service that is targeted at hotels, hospitals, universities, and other business establishments. Clearly, it is not a "payphone-specific" service.

¹² While U S WEST's payphone operation uses CUSTOMNET, its use is limited to approximately 20 percent of U S WEST's payphone lines.

¹³ See Application No. 245.

¹⁴ Special Permission No. 97-125.

¹⁵ See U S WEST Transmittal No. 836 filed April 14, 1997, effective April 15, 1997.

III. U S WEST CONTINUES TO HAVE NUMEROUS CALL BLOCKING AND CALL SCREENING SERVICES AVAILABLE TO PSPS IN ITS FEDERAL TARIFF

APCC implies that with the withdrawal of CUSTOMNET, U S WEST will not have any call screening or call blocking services tariffed at the federal level. This is not true. APCC conveniently ignores the fact that U S WEST has numerous call screening and call blocking services available to PSPs and other customers in its federal tariff.¹⁶ For example, U S WEST provides the following services under federal tariff: Billed Number Screening, Call Blocking for 10XXX1+/10XXX011+, and International Blocking.¹⁷ These services give PSPs a wide variety of call screening and call blocking features should they choose to purchase them from U S WEST.¹⁸

IV. CONCLUSION

The APCC is not asking for clarification; it is asking for reconsideration of both the Commission's Waiver Order and Order on Reconsideration. The Commission should reject APCC's attempt to unduly expand the Payphone Order's

¹⁶ U S WEST also has tariffed Answer Supervision-Lineside in its Federal Access Services Tariff.

¹⁷ U S WEST's Tariff F.C.C. No. 5, Sections 13.3.19.B., D. and 13.3.12.

¹⁸ Furthermore, many of the "smart" phones currently available to PSPs incorporate many of these functions in their internal hardware and software. Future generations of "smart" payphones will incorporate even greater functionality.

federal tariffing requirement. APCC's arguments contain no new content; they are just packaged differently. As such, APCC's Petition should be denied.

Respectfully submitted,

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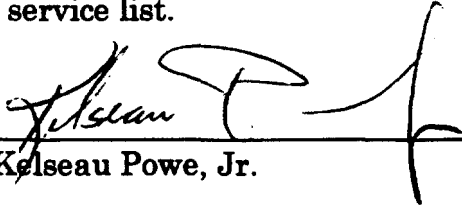
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May 20, 1997

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 20th day of May, 1997, I have caused a copy of the foregoing **OPPOSITION OF U S WEST COMMUNICATIONS, INC.** to be served via first-class U.S. Mail, postage-prepaid, upon the persons listed on the attached service list.


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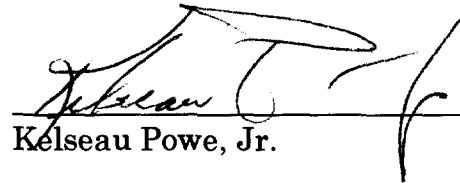
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